

Mr. Kerry Kaminski  
DTE Indycok, LLC  
P.O. Box 8614  
425 South Main Street, Suite 201  
Ann Arbor, Michigan 48107

Re: Minor Source Modification No:  
097-12101-00061

Dear Mr. Kaminski:

As you may know, Citizen's Gas & Coke Utility (T097-7302-00061) applied for a Part 70 (Title V) Operating Permit on September 4, 1996. To date, the initial Part 70 Operating Permit for Citizen's Gas & Coke Utility has yet to be issued by the Indiana Department of Environmental Management (IDEM) and the City of Indianapolis Environmental Resources Management Division (ERMD). DTE Indycok, LLC, had applied for a Part 70 Minor Source Modification operating permit on March 27, 2000 for construction and operation of a synthetic fuel manufacturing facility to be collocated with Citizen's Gas & Coke Utility at 2950 East Prospect Street in Indianapolis, Indiana. IDEM and ERMD have determined that a support relationship exists between DTE Indycok, LLC, and Citizen's Gas & Coke Utility because DTE Indycok, LLC, is adjacent or contiguous, receives all coal from Citizen's Gas & Coke Utility and, initially, will provide more than fifty percent (50%) of its product (briquettes) to Citizen's Gas & Coke Utility. Therefore, a support relationship is demonstrated pursuant to 326 IAC 2-7-1(22) (Part 70 Permit Program: Definitions; Major Source). Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) A synthetic fuel manufacturing facility which includes one (1) crusher, identified as Emission Unit ID AP, with a maximum capacity of 175 tons per hour, using a jetpulse baghouse identified as Control Equipment ID BP, which has a maximum design flow rate of 20,000 acfm exhausting to Stack/Vent ID AL. Support equipment includes:
  - (1) One (1) hopper, with a maximum capacity of 175 tons coal per hour,
  - (2) Two (2) conveyers, each with a maximum capacity of 175 tons material per hour,
  - (3) Nine (9) conveyers, each with a maximum capacity of 58 1/3 tons material per hour,
  - (4) Two (2) pairs conveyers, each with a maximum capacity of 175 tons coal per hour,
  - (5) Two (2) silos, each with a maximum capacity of 87.5 tons coal material per hour,
  - (6) Three (3) pugmills, each with a maximum capacity of 58 1/3 tons coal material per hour,
  - (7) Three briquetters, each with a maximum capacity of 58 1/3 tons coal material per hour,
- (b) Three binder storage tanks, identified as Emission Unit ID BQ, each with a maximum capacity of 25,000 gallons, storing water-based asphalt emulsion, or similar materials, equipped with no pollution control device, and exhausting to Stack/Vent ID BQ.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

Pursuant to 326 IAC 2-1.1-8 (Time Periods for Determination on Permit Applications), the City of Indianapolis ERMD has exceeded the rule mandated time frame of forty five (45) days for this issuance and is therefore suspending the \$500 dollar Minor Source Modification fee.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call 317 327-2234.

Sincerely,

Mona A. Salem  
Chief Operating Officer  
Department of Public Works  
City of Indianapolis

Attachments

DSF

cc: U.S. EPA, Region V  
Indianapolis ERMD  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**PART 70 MINOR SOURCE MODIFICATION**

**OFFICE OF AIR MANAGEMENT**  
**and**  
**INDIANAPOLIS ENVIRONMENTAL RESOURCES**  
**MANAGEMENT DIVISION**

**DTE Indycoke, LLC at  
Citizens Gas & Coke Utility  
2950 East Prospect Street  
Indianapolis, Indiana 46203**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: T097-12101-00061	
Issued by:  Mona A. Salem, Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Indianapolis Environmental Resources Management Division (IERMD). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a synthetic fuel manufacturing facility.

Responsible Official: Barry Markowitz  
Source Address: 2950 East Prospect Street, Indianapolis, Indiana, 46203  
Mailing Address: P.O. Box 8614, 425 South Main Street, Suite 201, Ann Arbor, MI 48107  
Phone Number: (734) 913-5992 for Kerry Kaminski  
SIC Code: 2999  
County Location: Marion County  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program; Major under PSD Rules

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) A synthetic fuel manufacturing facility which includes one (1) crusher, identified as Emission Unit ID AP, with a maximum capacity of 175 tons per hour, using a jetpulse baghouse identified as Control Equipment ID BP, which has a maximum design flow rate of 20,000 acfm exhausting to Stack/Vent ID AL. Support equipment includes:
  - (1) One (1) hopper, with a maximum capacity of 175 tons coal per hour,
  - (2) Two (2) conveyers, each with a maximum capacity of 175 tons material per hour,
  - (3) Nine (9) conveyers, each with a maximum capacity of 58 1/3 tons material per hour,
  - (4) Two (2) pairs conveyers, each with a maximum capacity of 175 tons coal per hour,
  - (5) Two (2) silos, each with a maximum capacity of 87.5 tons coal material per hour,
  - (6) Three (3) pugmills, each with a maximum capacity of 58 1/3 tons coal material per hour,
  - (7) Three briquetters, each with a maximum capacity of 58 1/3 tons coal material per hour,
- (b) Three binder storage tanks, identified as Emission Unit ID BQ, each with a maximum capacity of 25,000 gallons, storing water-based asphalt emulsion, or similar materials, equipped with no pollution control device, and exhausting to Stack/Vent ID BQ.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a support facility for Citizens Gas & Coke Utility, T097-7302-00061, a major source, as defined in 326 IAC 2-7-1(22). The application will be incorporated in that of Citizens Gas & Coke Utility.

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification ~~[326 IAC 2-7-4(f)]~~~~[326 IAC 2-7-6(1)]~~~~[326 IAC 2-7-5(3)(C)]~~

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan ~~[326 IAC 2-7-5(1),(3) and (13)]~~ ~~[326 IAC 2-7-6(1) and (6)]~~ ~~[326 IAC 1-6-3]~~

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and IERMD upon request and shall be subject to review and approval by IDEM, OAM, and IERMD. IDEM, OAM, and IERMD may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### C.3 Permit Amendment or Modification ~~[326 IAC 2-7-11]~~ ~~[326 IAC 2-7-12]~~

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

#### C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

#### C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

### Testing Requirements [326 IAC 2-7-6(1)]

#### C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management



100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and IERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, and IERMD, if the source submits to IDEM, OAM, and IERMD a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

##### **C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

##### **C.8 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that

reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.9 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C.6 - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, and IERMD within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and IERMD shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM and IERMD within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and IERMD reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM and IERMD that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM IERMD may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.10 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C.6- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM , OAM and IERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.11 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a

period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and IERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or IERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or IERMD within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and IERMD on or before the date it is due.
- (c) Unless otherwise specified in this approval, any or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report(s) does(do) not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) A synthetic fuel manufacturing facility which includes one (1) crusher, identified as Emission Unit ID AP, with a maximum capacity of 175 tons per hour, using a jetpulse baghouse identified as Control Equipment ID BP, which has a maximum design flow rate of 20,000 acfm exhausting to Stack/Vent ID AL. Support equipment includes:
- (2) One (1) hopper, with a maximum capacity of 175 tons coal per hour,
  - (3) Two (2) conveyers, each with a maximum capacity of 175 tons material per hour,
  - (4) Nine (9) conveyers, each with a maximum capacity of 58 1/3 tons material per hour,
  - (5) Two (2) pairs conveyers, each with a maximum capacity of 175 tons coal per hour,
  - (6) Two (2) silos, each with a maximum capacity of 87.5 tons coal material per hour,
  - (7) Three (3) pugmills, each with a maximum capacity of 58 1/3 tons coal material per hour,
  - (8) Three briquetters, each with a maximum capacity of 58 1/3 tons coal material per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Y.

#### D.1.2 New Source Performance Standard (NSPS) [326 IAC 12-1][40 CFR Part 60.250, Subpart Y]

Pursuant to 326 IAC 12-1 and 40 CFR Part 60.250 (Standards of Performance for Coal Preparation Plants), the Permittee shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal, gases which exhibit twenty (20%) percent opacity or greater.

#### D.1.3 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Rules; Nonattainment Area Particulate Limitations: Specified), PM emissions from Emission Unit ID AP shall not exceed 0.03 grains per dry standard cubic foot exhaust. This is equivalent to 5.14 lbs particulate matter per hour.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C.2 - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### Compliance Determination Requirements

#### D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM and ERMD may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM and/or ERMD, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C.6 - Performance Testing.

**D.1.6 New Source Performance Standard (NSPS) [326 IAC 12-1][40 CFR Part 60.252(c) & 40 CFR Part 60.8]**

Pursuant to 326 IAC 12-1, 40 CFR Part 60.252(c) and 40 CFR Part 60.8, within sixty (60) days after achieving the maximum production rate at which Emission Unit ID AP will be operated, but not later than one hundred and eighty (180) days after initial startup, the Permittee shall conduct Method 9 opacity evaluations utilizing the notification procedures of 40 CFR Part 60.7 and the initial opacity evaluation procedures as specified in 40 CFR Part 60 Appendix A and 40 CFR 60.11. Notification and reporting shall be in accordance with Section C.6 Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.7 Visible Emissions Notations**

- (a) Daily visible emission notations of the coal processing and conveying equipment, coal storage system, coal transfer and loading system processing coal shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.8 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the coal processing and conveying equipment, coal storage system, coal transfer and loading system processing coal.
- (b) All records shall be maintained in accordance with Section C.11 - General Record Keeping Requirements, of this permit.

## **SECTION D.2 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-7-5(15)]**

- (b) Three binder storage tanks, identified as Emission Unit ID BQ, each with a maximum capacity of 25,000 gallons, storing water-based asphalt emulsion, or similar materials, equipped with no pollution control device, and exhausting to Stack/Vent ID BQ.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.2.1 Record Keeping Requirement [40 CFR Part 60.116b][326 IAC 12-1]**

Pursuant to the New Source Performance Standard 40 CFR Part 60.116b Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction or Modification Commenced after July 23, 1984, the Permittee shall keep readily accessible records showing the dimension and tank capacity of each storage tank under Emission Unit ID BQ. This record shall be kept for the life of the source.

#### **D.2.2 Reporting Requirement [40 CFR Part 60.116b][326 IAC 12-1]**

Pursuant to the New Source Performance Standard 40 CFR Part 60.116b Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction or Modification Commenced after July 23, 1984, the Permittee shall notify IDEM, OAM and ERMD within thirty (30) days when the maximum true vapor pressure of the liquid being stored in any tank under Emission Unit ID BQ exceeds 27.6 kilopascals (kPa). Available data on the maximum true vapor pressure of the liquid being stored shall be in accordance with 40 CFR Part 60.116b(e).



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION  
DATA COMPLIANCE**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: DTE Indycoke, LLC  
Source Address: 2950 East Prospect Street, Indianapolis, Indiana 46203  
Mailing Address: P.O. Box 8614, Ann Arbor, Michigan 48107  
Source Modification No.: T097-12101-00061

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**Indiana Department of Environmental Management  
Office of Air Management  
and  
Indianapolis Environmental Resources Management Division**

**Technical Support Document (TSD) for a Part 70 Minor Source  
Modification**

**Source Background and Description**

Source Name:	DTE Indycoke, LLC at Citizens Gas & Coke Utility
Source Location:	2950 East Prospect Street, Indianapolis, Indiana 46203
County:	Marion County
SIC Code:	2999
<b>Operation Permit No.:</b>	<b>T097-12101-00061</b>
<b>Operation Permit Issuance Date:</b>	<b>To Be Issued</b>
Minor Source Modification No.:	097-12101-00061
Permit Reviewer:	David Foster

The Office of Air Management (OAM) and the Indianapolis Environmental Resources Management Division (ERMD) has reviewed a modification application from DTE Indycoke relating to the construction of the following emission units and pollution control devices:

- (a) A synthetic fuel manufacturing facility which includes one (1) crusher, identified as Emission Unit ID AP, with a maximum capacity of 175 tons per hour, using a jetpulse baghouse identified as Control Equipment ID BP, which has a maximum design flow rate of 20,000 acfm exhausting to Stack/Vent ID AL. Support equipment includes:
  - (1) One (1) hopper, with a maximum capacity of 175 tons coal per hour,
  - (2) Two (2) conveyers, each with a maximum capacity of 175 tons material per hour,
  - (3) Nine (9) conveyers, each with a maximum capacity of 58 1/3 tons material per hour,
  - (4) Two (2) pairs conveyers, each with a maximum capacity of 175 tons coal per hour,
  - (5) Two (2) silos, each with a maximum capacity of 87.5 tons coal material per hour,
  - (6) Three (3) pugmills, each with a maximum capacity of 58 1/3 tons coal material per hour,
  - (7) Three briquetters, each with a maximum capacity of 58 1/3 tons coal material per hour,
- (a) Three binder storage tanks, identified as Emission Unit ID BQ, each with a maximum capacity of 25,000 gallons, storing water-based asphalt emulsion, or similar materials, equipped with no pollution control device, and exhausting to Stack/Vent ID BQ.

**History**

Citizens Gas & Coke Utility submitted a Title V application, received by ERMD on September 24, 1996. A Title V permit has not been issued to Citizens Gas & Coke Utility. On March 27, 2000, DTE Indycoke, LLC, submitted an application to the OAM and IERMD requesting to add a

synthetic fuel manufacturing facility. DTE Indycoke, LLC, would be considered a support facility for Citizens Gas & Coke Utility, a coke manufacturing plant, because all the synthetic fuel to be manufactured by DTE Indycoke, LLC will be used by Citizens Gas & Coke Utility.

### Source Definition

This coke manufacturing consists of a source with an on-site contractor:

- (a) Plant 1, Citizens Gas & Coke Utility, the primary operation, is located at, 2950 East Prospect Street, Indianapolis, Indiana; and
- (b) Plant 2, DTE Indycoke, LLC, the supporting operation, is located at 2950 East Prospect Street, Indianapolis, Indiana.

IDEM and ERMD have determined that Plant 1, Citizens Gas, and Plant 2, DTE Indycoke, LLC, are under the common control of Citizens Gas & Coke Utility. These two plants are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both Citizens Gas & Coke Utility and DTE Indycoke, LLC, as one (1) source.

On March 27, 2000, DTE Indycoke, LLC, submitted an application to the OAM and IERMD requesting to add a synthetic fuel manufacturing facility. This new facility would be considered a support facility for Citizens Gas & Coke Utility, a coke manufacturing plant, because all the synthetic fuel to be manufactured by DTE Indycoke, LLC will be used by Citizens Gas & Coke Utility. A Title V application from Citizens Gas was received by ERMD on September 24, 1996. Citizens Gas has not been issued a Part 70 permit.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
AL	Crusher	60*	12 inches DIA*	20,000*	Ambient
BQ	Three 25,000 gallon asphalt binder storage tanks	n/a*	n/a*	n/a*	n/a*

\*Final design is to be determined.

### Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 27, 2000. Additional information was received on May 22, 2000.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations, Appendix A, pages 1 through 3.

## Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	21.9
PM-10	9.4
SO <sub>2</sub>	0.0
VOC	0.012
CO	0.0
NO <sub>x</sub>	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Benzene	0.0012
Ethylbenzene	0.0054
TOTAL	0.0066

### (a) Fugitive Emissions

This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2. However, there is an applicable New Source Performance Standards that was in effect (40 CFR Part 60 Subpart Y) prior to August 7, 1980. Therefore, the fugitive PM emissions were counted toward determination of PSD and Emission Offset applicability.

## Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(A), Modifications, where the modifications have a potential to emit of less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either particulate matter (PM) or particulate matter less than ten (10) microns (PM<sub>10</sub>).

## County Attainment Status

The source is located in Marion County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	Attainment
SO <sub>2</sub>	Maintenance
NO <sub>2</sub>	Attainment
Ozone	Maintenance
CO	Maintenance
Lead	Maintenance

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as maintenance, attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM<sub>10</sub>. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

#### Source Status

No previous emission data has been received from the source.

#### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Crusher	21.9	9.4	0.0	0.0	0.0	0.0	0.0066
Three 25,000 Tanks	0.0	0.0	0.0	0.012	0.0	0.0	0.0

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

#### Federal Rule Applicability

The storage tanks are subject to the provisions of New Source Performance Standard 326 IAC 12, 40 CFR 60.110b, Subpart Kb. This rule applies to the three (3) storage tanks, each with a maximum capacity of 25,000 gallons, storing water-based asphalt emulsion or similar materials, and requires the following:

- (a) Record keeping reporting requirements for the three (3) 25,000 gallon storage tanks since their capacities are greater than 19,815 but less than 39,394 gallons and the maximum vapor pressure is less than, or equal to, 2.18 psia;

- (b) The records must consist of dimensions and capacity along with exceedances of a vapor pressure of 2.18 psia; and
- (c) Any exceedances of the vapor pressure limit shall be reported to OAM and ERMD within 30 days of the date of the incident.

The crusher is subject to the provisions of 326 IAC 12, 40 CFR Part 60.250 Subpart Y, New Source Performance Standards for Coal Preparation. This rule limits emissions from any coal processing and conveying equipment, coal storage system, or coal transfer and loading to less than, or equal to, twenty percent (20%) opacity.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

### **State Rule Applicability - Entire Facility**

#### **326 IAC 1-6 (Malfunctions)**

362 IAC 1-6 (Malfunctions) is superseded by 326 IAC 2-7-16 (Emergency Provisions) and 326 IAC 2-7-5(3)(C)(ii) (Deviations from Permit Requirements and Conditions).

#### **326 IAC 2-6 (Emission Reporting)**

The synthetic fuel manufacturing facility is not subject to the provisions of 326 IAC 2-6 (Emission Reporting). The potential emissions of NOx and VOC from the synthetic fuel manufacturing facility is not greater than ten (10) tons per year. However, this is a support facility of Citizens Gas and Coke Utility which currently has potential emissions of NOx and VOC of greater than 10 tons per year and which is subject to these provisions. Therefore, this synthetic fuel manufacturing facility shall be include in Citizens Gas & Coke Utility's annual emission statement pursuant to 326 IAC 2-6 (Emission Reporting) and 326 IAC 2-7-1(22) (Part 70 Permit Program: Definitions; Major Source).

#### **326 IAC 2-7 (Part 70 Permit Program)**

Pursuant to 326 IAC 2-7-1(22), any stationary source (or group of stationary sources) that supports another source, where both are under common control of the same person (or persons under common control) and are located on contiguous or adjacent properties, shall be considered a support facility and part of the same source regardless of the two (2) digit SIC code for that support facility. A stationary source (or group of stationary sources) is considered a support facility to a source if at least fifty percent (50%) of the output of the support facility is dedicated to the source. DTE Indycoke is adjacent and contiguous to Citizens Gas & Coke Utility, receives all coal to be input to the process from Citizens Gas & Coke Utility and will supply greater than fifty percent (50%) of its output to Citizens Gas & Coke Utility. Therefore, this application request has reviewed as a minor modification to an existing Part 70 source.

#### **326 IAC 2-7-5(13) (Preventive Maintenance Plan)**

The permittee shall prepare and maintain preventative maintenance plan within ninety (90) days of date of issuance of this permit and include the following information:

- (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (b) Description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (c) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

### 326 IAC 7 (Sulfur Dioxide Emissions)

This modification will not result in an increase in SO<sub>2</sub> emissions. The potential SO<sub>2</sub> emissions from the modification are less than 25 tons per year. Therefore, this facility is not subject to the provisions of 326 IAC 7 (Sulfur Dioxide Emissions).

## State Rule Applicability - Individual Facilities

### 326 IAC 6-1-2(a) (Particulate Rules)

The crusher, emission unit ID AP, is subject to the provisions of 326 IAC 6-1-2(a), (Particulate Rules; Nonattainment Area Particulate Limitations: Specified). The potential particulate matter emissions from the synthetic fuel manufacturing facility are less than 100 tons per year. However, this is a support facility of Citizens Gas and Coke Utility which currently has potential emissions of particulate matter of greater than 100 tons per year and which is subject to these provisions. Therefore, this synthetic fuel manufacturing facility is subject to the provisions of this rule of emissions limited to 0.03 grains per dry standard cubic foot of discharge.

### 326 IAC 12 (New Source Performance Standards)

The crusher and storage tanks are subject to the provisions of the New Source Performance Standards, 40 CFR Part 60.11(b), [Subpart Kb] and 40 CFR Part 60.250, [Subpart Y], respectively, which are incorporated by reference under 326 IAC 12. Refer to Federal Rule Applicability section, above.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. The coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal has applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emission notations of the coal processing and conveying equipment, coal storage system, coal transfer and loading system processing coal shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (b) For processes operated continuously, "normal" means those conditions

prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.

### **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 097-12101-00061.



Appendix A: Emissions Calculations  
DTE INDYCOKE, LLC  
Address: 2950 E. Prospect Street  
Indianapolis, In  
MOD: 097-12101-00387

Page 1 of 3 TSD App A

Operation	Rated Capacity		Unadjusted Emission Factor*				Notes	Emission	Basis	Adjusted Emission Factor				Potential to Emit			
	(combined)	Units	PM	PM10	Units	Source				Factor	PM	PM10	Units	PM	PM	PM10	PM10
	Amount					(x,y)		Adjustment				(lbs/hr	(tons/yr	(lbs/hr	(tons/yr)		
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	enclosed	0%	B	0.00294	0.00140	lb/ton	0.515	2.25	0.245	1.07	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	enclosed	0%	B	0.00294	0.00140	lb/ton	0.515	2.25	0.245	1.07	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	enclosed	0%	B	0.00294	0.00140	lb/ton	0.515	2.25	0.245	1.07	
crushing	175.0	tons/hr	0.0050	0.0024	lb/ton	1,2	enclosed	0%	B	0.00504	0.00240	lb/ton	0.882	3.86	0.420	1.84	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	enclosed	0%	B	0.00294	0.00140	lb/ton	0.515	2.25	0.245	1.07	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	enclosed	0%	B	0.00294	0.00140	lb/ton	0.515	2.25	0.245	1.07	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	enclosed	0%	B	0.00294	0.00140	lb/ton	0.515	2.25	0.245	1.07	
mixing	175.0	tons/hr	0.0000	0.0000	lb/ton	N/A	encl+asph		D	0.00000	0.00000	lb/ton	0.000	0.00	0.000	0.00	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	encl+asph	95%	C	0.00015	0.00007	lb/ton	0.026	0.11	0.012	0.05	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	encl+asph	95%	C	0.00015	0.00007	lb/ton	0.026	0.11	0.012	0.05	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	encl+asph	95%	C	0.00015	0.00007	lb/ton	0.026	0.11	0.012	0.05	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	encl+asph	95%	C	0.00015	0.00007	lb/ton	0.026	0.11	0.012	0.05	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4	encl+asph	95%	C	0.00015	0.00007	lb/ton	0.026	0.11	0.012	0.05	
conveying	175.0	tons/hr	0.0029	0.0014	lb/ton	1,4 or 1,5	encl+asph	95%	C	0.00015	0.00007	lb/ton	0.026	0.11	0.012	0.05	
fugitive	0.139	mile/hr	6.0975	1.1896	lb/VMT	AP-42 13.2.1			A	6.09750	1.19898	lb/ton	0.848	3.71	0.167	0.73	
Totals												5.000	21.90	2.14	9.38		

used

and, asphalt has been added

Basis Codes:

- A Uncontrolled emission factor
- B Uncontrolled emission factor, 0% emissions reduction by enclosure design
- C Uncontrolled emission factor, 50% emissions reduction by asphalt addition and enclosure
- D No emissions, enclosed system

comparison of ratios in AP-42 Sections 13.2.2 and 13.2.4)



DTE INDYCOKE, LLC

Address: 2950 E. Prospect Street

Indianapolis, In

MOD: 097-12101-00387

Crushed Stone

AP-42 11.19

Source #	SCC Codes	Activity Description	PM10	Notes
2	3-05-010-10	Crushing	0.0024	
3	3-05-010-12	Screening	0.015	No screening related to this process
4	3-05-010-11	Conveying	0.0014	
5	3-05-010-11	Conveying, controlled	0.000048	
5	3-05-010-15	Loading	0.0001	

References for factors:

AP-42



A



DTE INDYCOKE, LLC

Address: 2950 E. Prospect Street

Indianapolis, In

MOD: 097-12101-00387

 $E = k(sL/2)^{0.65} * (W/3)^{1.5} = \text{lb particulate/vehicle mile traveled}$ 
 AP-42 13.2.1 Paved Roads

 $k$  (constant) = 0.016 = particulate size multiplier for PM10

0.082 = particulate size multiplier for PM

 $sL$  (silt loading, g/m<sup>2</sup>) = 9.7 Iron and steel industry silt loading factor used. This factor was considered appropriate because of the coke storage and handling typical of the iron and steel industries.

 $W$  = mean vehicular weight (Megagrams in formula, 1 ton = 0.9072 Mg)

Vehicle Type	Weight (tons)	Trip (mi) Distance	# Trips per Day	Total Miles (One Day)	Day/Year	E (PM10) (lb/VMT)	PM10 (ton/yr)	E (PM) (lb/VMT)	PM (ton/yr)
Tanker	29.5	0.76	4.4	3.3	365	1.19	0.72	6.1	3.71

0.183 0.139 per hour

## Notes:

Weight of empty tanker 20.0 tons  
 Gallons held 4,800 gallons  
 Density of emulsion 7.923 lbs/gal  
 Weight of loaded tanker 39.0 tons  
 Average weight of tanker 29.5 tons

